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Attorneys for Defendants  
9 TIMOTHY C. DRAPER and DRAPER ASSOCIATES V  
10 CRYPTO LLC, a Delaware limited liability company

11 UNITED STATES DISTRICT COURT  
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA

13 SAN FRANCISCO DIVISION

14 BRUCE MACDONALD, Individually and on  
15 Behalf of All Others Similarly Situated,

16 Plaintiff,

17 vs.

18 DYNAMIC LEDGER SOLUTIONS, INC., a  
19 Delaware corporation, TEZOS STIFTUNG, a  
20 Swiss foundation, KATHLEEN BREITMAN,  
21 an individual, ARTHUR BREITMAN, an  
individual, TIMOTHY COOK DRAPER, an  
individual, DRAPER ASSOCIATES,  
JOHANN GEVERS, DIEGO PONZ, GUIDO  
SCHMITZ-KRUMMACHER, BITCOIN  
SUISSE AG, NIKLAS NIKOLAJSEN and  
DOES 1-100, INCLUSIVE,

22 Defendants.

Case No. 3:17-cv-07095-RS

**JOINT STIPULATION REGARDING  
SERVICE AND EXTENDING TIME FOR  
TIMOTHY C. DRAPER AND DRAPER  
ASSOCIATES V CRYPTO LLC TO  
RESPOND TO COMPLAINT**

1 Defendants Timothy Draper and Draper Associates V Crypto LLC (collectively the  
 2 “Draper Defendants”) and Plaintiff Bruce MacDonald (“MacDonald”) hereby stipulate pursuant  
 3 to Civil L. R. 6-1(a) to extend the time for the Draper Defendants to respond to the putative class  
 4 action complaint filed by MacDonald (the “Complaint”) (Dkt. No. 1) in the above- captioned  
 5 action and to resolve issues related to service as follows:

6 WHEREAS, on December 13, 2017, MacDonald filed the Complaint;

7 WHEREAS, the Complaint names as a defendant an entity identified as “DRAPER  
 8 ASSOCIATES”, which Draper Associates V Crypto LLC contends does not exist and which it  
 9 presumes refers to it;

10 WHEREAS, Draper Defendants contend MacDonald has not yet served either of the  
 11 Draper Defendants with a summons or Complaint, and Plaintiffs contend both were served;

12 WHEREAS, the parties have met and conferred regarding the topic of service;

13 WHEREAS, in order to avoid motion practice with respect to service and for purposes of  
 14 judicial efficiency, the Draper Defendants agree to waive service of the summons and Complaint  
 15 as of the date of this Stipulation;

16 WHEREAS, the parties further agree that any prior deadline to respond to the Complaint  
 17 is vacated and pursuant to Civil L. R. 6-1(a), the Draper Defendants do not have any obligation to  
 18 respond to the Complaint until March 6, 2018;

19 WHEREAS, this stipulated extension will not alter the date of any event or any deadline  
 20 already fixed by order of this Court; and

21 WHEREAS, there have not been any previous time modifications in this case.

22 NOW, THEREFORE, the parties, hereby stipulate as follows:

- 23 1. The Draper Defendants shall waive service of the summons and Complaint; and
- 24 2. The Draper Defendants shall not be required to move to dismiss or otherwise
- 25 respond to the Complaint until March 6, 2018. Pursuant to Civil L. R. 6-1(a), this
- 26 paragraph shall be effective upon the filing of this Stipulation with the Court.

**IT IS SO STIPULATED.**

Dated: January 8, 2018

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Reed R. Kathrein

Reed R. Kathrein  
Attorneys for Plaintiff BRUCE  
MACDONALD

MANATT, PHELPS & PHILLIPS, LLP

By: /s/ Christopher L. Wanger

Christopher L. Wanger  
Attorneys for Defendants TIMOTHY  
DRAPER and DRAPER ASSOCIATES V  
CRYPTO LLC

**FILER'S ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), regarding signatures, Christopher L. Wanger hereby attests that concurrence in the filing of this document has been obtained from all the signatories above.

Dated: January 8, 2018

s/ Christopher L. Wanger  
Christopher L. Wanger

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